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Christopher A. Lynch, Esq.

*Counsel for Michael Fuqua,
in his capacity as Receiver of Theia Group, Inc.,
Theia Aviation LLC, and Theia Holdings A, Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**DECLARATION IN SUPPORT OF MOTION TO WITHDRAW
AS COUNSEL TO RECEIVER**

CHRISTOPHER A. LYNCH hereby declares:

1. I am currently counsel with the law firm Reed Smith.
2. I am admitted to practice in this Court, and I respectfully submit this Declaration in support of my Motion to Withdraw as Counsel for Michael Fuqua, in his capacity as Receiver of Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc. (“Receiver”).
3. Local Civil Rule 1.4 provides that:

An attorney who has appeared as attorney of record for a party may be relieved or displaced only by order of the Court and may not withdraw from a case without leave of the Court granted by order. Such an order may be granted only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement

4. I am moving to withdraw as counsel of record because, as of September 2, 2022, I will no longer affiliated with Reed Smith LLP.

5. My withdrawal as counsel of record will not unduly prejudice the Receiver or cause any delay in these proceedings, as Kurt F. Gwynne and Jason D. Angelo of Reed Smith LLP will continue to represent the Receiver.

6. I am not asserting a retaining or charging lien.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 30, 2022
New York, New York

Respectfully submitted,

REED SMITH LLP

/s/ Christopher A. Lynch, Esq.
Christopher A. Lynch, Esq.

*Counsel for Michael Fuqua,
in his capacity as Receiver of Theia Group, Inc.,
Theia Aviation LLC, and Theia Holdings A, Inc.*